UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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Office of the Regional Administrator

October 14, 2020

Robert Taylor, Director
Concerned Citizens of St. John the Baptist Parish
Reserve, Louisiana
Sent via email: Robert Taylor <btcnola@gmail.com

Vickie Boothe, Scientific Advisor
Concerned Citizens of St. John the Baptist Parish
Reserve, Louisiana
Sent via email: Vickie Boothe <boothevickiel@gmail.com>

Dear Mr. Taylor and Ms. Boothe,

Thank you for your letter dated September 30, 2020, expressing your concerns regarding the U.S. Environmental Protection Agency (EPA) discontinuing the chloroprene community ambient air monitoring in Laplace, Louisiana. EPA concluded its four year-long community air monitoring in September 2020, as we had publicly announced we would do last February. Though the air monitoring has been discontinued, EPA has been and will continue to be committed to working with the community in St. John the Baptist Parish as we fulfill our mission of protecting human health and the environment.

The Denka Performance Elastomer, LLC facility (Denka) has recently committed to continue their air monitoring efforts in the community through 2021, and they will share that data with EPA and the Louisiana Department of Environmental Quality (LDEQ). The data will be publicly available in LDEQ's Electronic Document Management System (EDMS). Last week, EPA announced over $311,000 in funding to the state of Louisiana to advance their efforts to help the state determine health risks from toxic air pollutants in the community near the Denka Plant in St. John the Baptist Parish. Also, under authorities outlined in the Clean Air Act, EPA has continuing negotiations with Denka and DuPont regarding our ongoing enforcement action.

Chloroprene is one of the 187 pollutants that Congress classified as "hazardous air pollutants," also called air toxics. The Clean Air Act instructs EPA to regulate air toxics by setting standards for listed source categories, rather than by setting ambient standards. Therefore, there is no federal ambient air quality standard for chloroprene in the air. EPA has been working with the community on issues related to air contaminants for many years and had specifically been conducting ambient monitoring for chloroprene at six locations in the community of LaPlace since May 2016 (Community Ambient Air Monitoring Program). The goal of this monitoring effort was to gather longer term data about the ambient chloroprene levels in the LaPlace community, and we have met that goal. As part of this effort, we have collected over 2,500 measurements of the chloroprene concentrations in the community. Since March 2018, when Denka implemented chloroprene emission control measures, average concentrations indicate a significant reduction in the level of chloroprene and a downward trend at all monitoring sites. The final Community Ambient Air Monitoring samples were collected on September 26, 2020, and EPA

removed the Community Ambient Air Monitoring network after the last sample collection. Monitoring analytical data has been posted to the public website at https://www.epa.gov/la/denka-air-monitoring-data-summary.

The Continuous Air Monitoring Program was not designed as a replacement for the Community Ambient Air Monitoring or to measure long term ambient chloroprene levels. Rather, it was designed to help EPA understand the magnitude and frequency of occasional, but recurring, elevated chloroprene measurements or "spikes" that, as demonstrated by the Community Ambient Air Monitoring data, contribute significantly to the long-term chloroprene averages. Another objective of the Continuous Air Monitoring Program is to help identify unknown or under-characterized emissions sources or activities at the facility. This continuous monitoring approach may help EPA identify possible actions that Denka could take to further reduce chloroprene in the community.

EPA began the Continuous Air Monitoring Program in March 2020. The Continuous Air Monitoring Program utilizes SPods to continuously measure concentrations of Volatile Organic Compounds (VOCs). Chloroprene is a VOC. When the VOC measurements exceed a threshold value (a trigger-level), a 24-hour average canister sample is collected and analyzed for chloroprene. The Initial Phase of the Continuous Air Monitoring Program helped EPA identify and address instrument performance issues and modifications to the canister sample triggering methodology. EPA is posting chloroprene sampling results from the Continuous Air Monitoring Program to the Denka Air Monitoring Data Summary Page: https://www.epa.gov/la/denka-air-monitoring-data-summary. EPA will continue to evaluate the trigger method and trigger levels used to collect samples for the duration of the Continuous Air Monitoring Program.

I thank you for your shared interest in addressing the chloroprene levels in the community of LaPlace. EPA continues to monitor the situation in the LaPlace community, and we are in regular communication with Denka. We have been encouraged by the overall results following emissions controls implemented by the company—leading to observed decreases in chloroprene concentrations in the neighborhoods--and we look forward to analyzing the data from the Continuous Air Monitoring system, and data provided by Denka.

Sincerely,

Ken McQueen
Regional Administrator

cc (by email):
The Honorable Cedric Richmond, Member of Congress, House of Representatives
Dr. Chuck Carr Brown, Secretary, Louisiana Department of Environmental Quality
Jaclyn Hotard, President, St. John the Baptist Parish
Dr. Lynett Hookfin, Superintendent, St. John the Baptist Parish Public School District